

## **Federal Operating Permit Article 1**

This permit is based upon the requirements of Title V of the Federal Clean Air Act and Chapter 80, Article 1 of the Commonwealth of Virginia Regulations for the Control and Abatement of Air Pollution. Until such time as this permit is reopened and revised, modified, revoked, terminated or expires, the permittee is authorized to operate in accordance with the terms and conditions contained herein. This permit is issued under the authority of Title 10.1, Chapter 13, §10.1-1322 of the Air Pollution Control Law of Virginia. This permit is issued consistent with the Administrative Process Act, and 9 VAC 5-80-50 through 9 VAC 5-80-300 of the State Air Pollution Control Board Regulations for the Control and Abatement of Air Pollution of the Commonwealth of Virginia.

Authorization to operate a Stationary Source of Air Pollution as described in this permit is hereby granted to:

Permittee Name:	Federal-Mogul Corporation
Facility Location:	Federal-Mogul Friction Products 2410 Paper Mill Road Winchester, VA 22601
Registration Number:	80430
Permit Number:	VRO80430

March 10, 2005

Effective Date

March 9, 2010

Expiration Date

*R. Bradley Chewning*

for Director, Department of Environmental Quality

March 10, 2005

Signature Date

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## **I. Facility Information**

### **Permittee**

Federal-Mogul Corporation  
Federal-Mogul Friction Products  
P.O. Box 3250  
Winchester, VA 22604

### **Responsible Official**

L. Howard Schmitt  
Plant Manager

### **Facility**

Federal-Mogul Friction Products  
2410 Papermill Road  
Winchester, VA 22601

### **Contact Person**

Aaron Burns  
Environmental Safety and Health Coordinator  
(540) 665-2288

**AIRS Identification Number:** 51-840-0001

**Facility Description:** SIC Code: 3714 - Manufacture of brake shoes and pads

Federal-Mogul Friction Products, a subsidiary of Federal Mogul Corporation, manufactures automobile and truck brake friction products. Air pollution from the facility includes particulate matter from brake compound transfer and mixing and brake finishing (grinders, drills, saws); volatile organic compound emissions from wet brake compound carrier solvent evaporation, resin decomposition in presses and curing ovens, and paint, adhesive, and cleaning solvent evaporation. There are also small amounts of natural gas combustion product emissions.

## II. Emission Units

Equipment to be operated consists of:

Emission Unit	Stack ID	Machine ID	PCD ID	PCD Description	Size/Rate Capacity	Pollutant Controlled	Applicable Permit Date
Compounding (G1) (4 Wetline lodgies, 5 Dryline lodgies, 3 Weigh stations, 3 Saws, 2 Preforms , 1 Press)							
G1	6-P56C	G1-CO-WL1 - WL3 G1-CO-WS3 G1-CO-GR1	6	Pulse Jet Fabric Filter Carborundum 216M10HP1 20,000 cfm	2.3 tons/hr	PM/PM10	2/6/79 (Trim Grinder (G1-CO-GR1))
	19-P34	G1-CO-WL4 G1-CO-DL1-DL5 G1-CO-WS1 - WS2	19	Pulse Jet Fabric Filter Micro Pul 221S10TRH 20,000 cfm			
	20-P35	G1-BL-SAW1 - SAW3 G1-BL-PR1 - PR2 G1-BL-PS1	20	Pulse Jet Fabric Filter Micro Pul 221S10TRH 20,000 cfm			
Preforming Process (G2) (32 Preforms, 2 Grinders, 1 Saw, 72 Presses, 20 Ovens, 5 Mill Rolls)							
G2	18-P3	G2-BL-PR1 - PR7	18	Pulse Jet Fabric Filter Micro Pul 221S10TRH 20,000 cfm	2.3 tons/hr	PM/PM10	12/22/04 (Direct Fill Machine G2-ST-PS46)
	21-P33	G2-BL-PR8 - PR12	21	Pulse Jet Fabric Filter Micro Pul 221S10TRH 20,000 cfm			
	22-P6A	G2-ST-PR1 - PR9 G2-ST-PS46	22	Pulse Jet Fabric Filter Micro Pul 255S1020TRH 24,000 cfm			
	23-P6B	G2-ST-PR10 - PR20 G2-ST-GR1 G2-ST-GR2 G2-ST-SAW1	23	Pulse Jet Fabric Filter Micro Pul 255S1020TRH 24,000 cfm			

Emission Unit	Stack ID	Machine ID	PCD ID	PCD Description	Size/Rate Capacity	Pollutant Controlled	Applicable Permit Date
G2	P30, P78-P93 P96-P101	G2-BL-PS1 - PS28 G2-ST-PS1 - PS44 G2-RL-ML1 - ML5			2.3 tons/hr	PM/PM10	
	FB6-FB14, FB16-FB19, FB23(1&2), FB53(1&2), FB54-FB56, FB85, FB101	G2-DB-OV1 - OV3 G2-BL-OV2 G2-ST-OV1 - OV16					
Finishing Process (G3) (42 Grinders, 9 Saws, 31 Drills)							
G3	1-P55A	G3-ST-GR1 -GR6	1	Pulse Jet Fabric Filter Pulse Clean 180-10 20,000 cfm	2.3 tons/hr	PM/PM10	12/22/04 (drill (G3-ST-DR15) and chamfer (G3-ST-GR24))
	2-P56A	G3-ST-GR7 - GR9 G3-ST-SAW1 G3-ST-DR1 - DR12 G3-ST-DR15	2	Pulse Jet Fabric Filter Carborundum 216M10HP1 20,000 cfm			
	3-P56B	G3-ST-SAW2 - SAW7 G3-ST-GR10 - GR19 G3-ST-GR24	3	Pulse Jet Fabric Filter Carborundum 216M10HP1 20,000 cfm			
	4-P55B	G3-ST-GR1 G3-ST-GR20 - GR23 G3-ST-DR13 - DR14	4	Pulse Jet Fabric Filter Carborundum 216M10HP1 20,000 cfm			
	5-P57A	G3-BL-DR1 - DR2 G3-BL-GR1 - GR2	5	Pulse Jet Fabric Filter Carborundum 216M10HP1 20,000 cfm			

Emission Unit	Stack ID	Machine ID	PCD ID	PCD Description	Size/Rate Capacity	Pollutant Controlled	Applicable Permit Date
G3	7-P57B	G3-BL-GR3 - GR8 G3-BL-DR3 - DR4	7	Pulse Jet Fabric Filter Carborundum 216M10HP1 20,000 cfm	2.3 tons/hr	PM/PM10	12/22/04 (drill (G3-ST-DR15) and chamfer (G3-ST-GR24))
	8-P58A	G3-BL-GR9 - GR14 G3-BL-SAW1	8	Pulse Jet Fabric Filter Carborundum 216M10HP1 20,000 cfm			
	24-P42	G3-BL-DR5 - DR17 G3-BL-GR15 - GR23 G3-BL-SAW2	24	Pulse Jet Fabric Filter Mikropul 255S1020THR 20,000 cfm			
Fuel Burning Equipment (G4)							
G4	FB1	Keeler Steam Boiler			39.8 MMBTU/HR		
	FB79	Clayton Steam Generator			12.5 MMBTU/HR		
Pelletizing Process (G5)							
G5	25-P76	Fabric Filter Dust Pelletizing Plant	25	Pulse Jet Fabric Filter Mikropul 81S1020TR 6,000 cfm	0.70 Tons/HR	PM/PM10	
Process Materials, Printing, and Adhesives (G6) (6 Videojet Units, 12 Printers, 2 PC Lines)							
G6	Various building vents and process stacks	G6-BL-VJ1 - VJ6 G6-ST-PT1 - PT12 G6-ST-PC1 G6-ST-PC2					

Emission Unit	Stack ID	Machine ID	PCD ID	PCD Description	Size/Rate Capacity	Pollutant Controlled	Applicable Permit Date
1998 Expansion (G7) (5 Preforms, 2 Saws, 1 Grinder)							
G7	27 - P95	G7-ST-PR28 G7-ST-PR29 G7-ST-PR30 G7-ST-PR31 G7-ST-PR32	27	Pulse Jet FabricFilter 25,000 cfm	0.99 tons brake compound per hour	PM/PM10	12/22/04
	27 – P95	G7-ST-SAW1	27 & 27D1	Pulse Jet Fabric Filter 25,000 cfm Drop Boxes (2)	0.99 tons brake compound per hour	PM/PM10	
		G7-ST-SAW2	27 & 27D2				
		G7-ST-GR1	27				

\*The Size/Rated Capacity is provided for informational purposes only, and is not an applicable requirement.



### III. Fuel Burning Equipment Requirements - Keeler Boiler (Ref. FB1)

#### A. Limitations

1. The approved fuel for the Keeler boiler (Ref. FB1) is natural gas. A change in the fuel may require a permit modification.  
(VAC 5-80-110)
2. Visible emissions from the Keeler boiler stack (Stack Ref. FB1) shall not exceed twenty percent (20%) opacity except during one six-minute period in any one hour in which visible emissions shall not exceed sixty percent (60%) opacity.  
(9 VAC 5-80-110 and 9 VAC 5-40-940)
3. Particulate matter emissions from the operation of Keeler boiler (Ref. FB1) shall not exceed 0.42 pounds per million BTU input.  
(9 VAC 5-80-110 and 9 VAC 5-40-900)
4. Sulfur dioxide emissions from the operation of Keeler boiler (Ref. FB1) shall not exceed 105 pounds per hour.  
(9 VAC 5-80-110 and 9 VAC 5-40-930)

#### B. Monitoring and Recordkeeping

The permittee shall maintain fuel purchase records for the facility. These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110)

#### C. Testing

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
SO <sub>2</sub>	EPA Method 6
PM/PM-10	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

#### **IV. Fuel Burning Equipment Requirements - Clayton Steam Generator (Ref. FB79)**

##### **A. Limitations**

1. The approved fuel for the Clayton steam generator (Ref. FB79) is natural gas. A change in the fuel may require a permit modification.  
(VAC 5-80-110)
2. Visible emissions from the Clayton steam generator exhaust (Stack Ref. FB79) shall not exceed twenty percent (20%) opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty percent (30%) opacity.  
(9 VAC 5-80-110 and 9 VAC 5-50-80)

##### **B. Monitoring and Recordkeeping**

The permittee shall maintain records of the daily amount of natural gas combusted in the Clayton steam generator (Ref. FB79). These records shall be available on site for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110, 9 VAC 5-50-410 and 40 CFR 60.48c.(g))

##### **C. Testing**

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

## V. Process Equipment Requirements - Compounding (Ref. G1)

### A. Limitations

1. Particulate matter emissions from the compounding process equipment (Ref. G1) shall be controlled by fabric filters (Ref. PCD19, PCD20 and PCD6). The fabric filters shall be provided with adequate access for inspection and shall be in operation when the compounding process equipment is operating.

(9 VAC 5-80-110)

2. There shall be no visible emissions from fabric filter exhausts (Stack Ref. 6-P56C, 19-P34 and 20-P35).

(9 VAC 5-80-110, 9 VAC 5-40-80, 9 VAC 5-50-80 and Condition 3 of 2/6/1979 Permit)

3. Particulate matter emissions from the fabric filter exhausts (Stack Ref. 6-P56C, 19-P34 and 20-P35) shall not exceed the process weight limit as determined by the following equation:

$$E = 4.10P^{0.67}$$

where:

E = emission rate in lbs/hr.

P = process weight rate in tons/hr.

(9 VAC 5-80-110 and 9 VAC 5-40-260)

4. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
- b. Maintain an inventory of spare parts.
- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided, including the names of trainees, the date of training and the nature of the training.

(9 VAC 5-80-110)

**B. Monitoring and Recordkeeping**

1. The fabric filters (Ref. PCD19, PCD20 and PCD6) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the compounding equipment (Ref. G1) is operating.  
(9 VAC 5-80-110)
2. The permittee shall perform daily inspections of the fabric filters (Ref. PCD19, PCD20 and PCD6). The inspections shall include an observation of the presence of visible emissions, and the pressure drop across the fabric filter. If visible emissions are observed, timely corrective action shall be taken such that the fabric filter resumes operation with no visible emissions. All observations and corrective actions taken shall be recorded.  
(9 VAC 5-80-110)
3. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the [Director, Valley Region](#). These records shall include, but are not limited to:
  - a. Records of maintenance and training as required by Condition V.A.4.
  - b. A log of daily fabric filter inspection results including:
    - (1) The date, time, and name of person performing each inspection;
    - (2) The pressure drop across each fabric filter;
    - (3) Whether or not there were visible emissions; and
    - (4) Any maintenance or repairs performed as a result of these inspections.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110)

**C. Testing**

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)

## **VI. Process Equipment Requirements - Preforming (Ref. G2)**

### **A. Limitations**

1. Particulate matter emissions from the Block and H&P presses (Ref. G2-BL-PR1-PR7, G2-BL-PR8-PR12, G2-ST-PR1-PR9 and G2-ST-PR10-PR20), Direct Fill Machine (Ref. G2-ST-PS46), grinders (Ref. G2-ST-GR1 and G2-ST-GR2) and saw (Ref. G2-ST-SAW1) shall be controlled by fabric filters (Ref. PCD18, PCD21, PCD22 and PCD23). The fabric filters shall be provided with adequate access for inspection and shall be in operation when the preforming process equipment (Ref. G2) is operating.  
(9 VAC 5-80-110 and Condition 4 of 12/22/2004 Permit)
2. The approved fuel for the cure ovens (Ref. G2-DB-OV1-OV3, G2-BL-OV2 and G2-ST-OV1-OV16) is natural gas. A change in the fuel may require a permit modification.  
(9 VAC 5-80-110)
3. Visible emissions from the fabric filter exhausts (Stack Ref. 18-P3, 21-P33, 22-P6A and 23-P6B) shall not exceed five percent (5%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).  
(9 VAC 5-80-110, 9 VAC 5-40-80, 9 VAC 5-50-80 and Condition 10 of 12/22/2004 Permit)
4. Visible emissions from the exhausts for the cure presses and Roll Mill machines (Stack Ref. P30, P78-P93 and P96-P101) and cure ovens (Stack Ref. FB6-FB14, FB16-FB19, FB23(1&2), FB53(1&2), FB54-FB56, FB85 and FB101) shall not exceed twenty percent (20%) opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty percent (30%) opacity.  
(9 VAC 5-80-110, 9 VAC 5-40-80 and 9 VAC 5-50-80)
5. Particulate matter emissions from the fabric filter exhausts (Stack Ref. 18-P3, 21-P33, 22-P6A and 23-P6B) shall not exceed the process weight limit as determined by the following equation:

$$E = 4.10P^{0.67}$$

where:

E = emission rate in lbs/hr.

P = process weight rate in tons/hr.

(9 VAC 5-80-110 and 9 VAC 5-40-260)

6. Sulfur dioxide emissions from the Ross Conveyor Cure Ovens (Ref. FB23-1 and FB23-2) shall not exceed 87 pounds per hour.  
(9 VAC 5-80-110 and 9 VAC 5-40-280)
7. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
  - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
  - b. Maintain an inventory of spare parts.
  - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
  - d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided, including the names of trainees, the date of training and the nature of the training.

(9 VAC 5-80-110 and Condition 19 of 12/22/2004 Permit)

8. Authorization to install and operate the Direct Fill Machine (Ref. G2-ST-PS46) shall become invalid, unless an extension is granted by the DEQ, if:
  - a. A program of continuous installation is not commenced before the latest of the following:
    - (1) 18 months from the December 22, 2004;
    - (2) Nine months from the date that the last permit or other authorization was issued from any other governmental agency;
    - (3) Nine months from the date of the last resolution of any litigation concerning any such permits or authorization; or
  - b. A program of installation is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

(9 VAC 5-80-110 and Condition 16 of 12/22/2004 Permit)

**B. Monitoring and Recordkeeping**

1. The fabric filters (Ref. PCD18, PCD21, PCD22 and PCD23) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be in operation when the preforming process equipment (Ref. G2) is operating.  
(9 VAC 5-80-110 and Condition 6 of 12/22/2004 Permit)
2. The permittee shall perform daily inspections of the fabric filters (Ref. PCD18, PCD21, PCD22 and PCD23). The inspections shall include observation of the presence of visible emissions, and the pressure drop across the fabric filter. If visible emissions are observed, timely corrective action shall be taken such that the fabric filter resumes operation with no visible emissions. All observations and corrective actions taken shall be recorded.  
(9 VAC 5-80-110 and Condition 12 of 12/22/2004 Permit)
3. The permittee shall perform visible emission surveys of uncontrolled preforming stacks as follows:
  - a. At a minimum of once per week, the permittee shall perform a visible emission survey of preforming stacks. The results of the survey shall be recorded. If any visible emissions are present from any stack, the date, time, stack ID, related production data for that stack, and whether or not visible emissions have been previously observed from that stack shall be recorded.
  - b. An EPA Method 9 visible emission evaluation (VEE) per Condition VI.C. shall be conducted if visible emissions have been previously observed from the stack. The VEE is to be conducted within a week under the same process operating conditions as when visible emissions were observed. If the VEE can not be performed within a week due to production schedule, the VEE may be rescheduled to the next earliest date that duplicates production conditions when visible emissions were present.
  - c. The VEE shall be conducted for a minimum period of six (6) minutes. If any of the observations exceed the applicable opacity limit, the observation period shall continue until sixty (60) minutes of observation have been completed.

All observations, VEE results and corrective actions taken shall be recorded.  
(9 VAC 5-80-110)
4. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the [Director, Valley Region](#). These records shall include, but are not limited to:



- a. Fuel purchase records for the facility.
- b. Records of maintenance and training as required by Condition VI.A.7.
- c. A log of daily fabric filter inspection results including:
  - (1) The date, time, and name of person performing each inspection;
  - (2) The pressure drop across each fabric filter;
  - (3) Whether or not there were visible emissions; and
  - (4) Any maintenance or repairs performed as a result of these inspections.
- d. A log of visual emission surveys performed on the uncontrolled preforming stacks as required by Condition VI.B.3.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Conditions 13 and 19 of 12/22/2004 Permit)

### C. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.  
(9 VAC 5-80-110 and Condition 7 of 12/22/2004 Permit)
2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM	EPA Methods 5, 17
SO <sub>2</sub>	EPA Method 6
Visible Emission	EPA Method 9

(9 VAC 5-80-110 and Condition 11 of 12/22/2004 Permit)

#### **D. Reporting**

The permittee shall furnish written notification to the [Director, Valley Region, of the actual start-up date of the Direct Fill Machine \(Ref. G2-ST-PS46\)](#) within 15 days after such date.

(9 VAC 5-80-110 and Condition 14 of 12/22/2004 Permit)

## **VII. Process Equipment Requirements - Finishing (Ref. G3)**

### **A. Limitations**

1. Particulate matter emissions from finishing equipment shall be controlled by fabric filters (Ref. PCD1-PCD5, PCD7, PCD8 and PCD24). The fabric filters shall be provided with adequate access for inspection and shall be in operation when the finishing process equipment (Ref. G3) is operating.

(9 VAC 5-80-110 and Condition 5 of 12/22/2004 Permit)

2. Visible emissions from the fabric filter exhausts (Stack Ref. 1-P55A, 2-P56A, 3-P56B, 4-P55B, 5-P57A, 7-P57B, 8-P58A and 24-P42) shall not exceed five percent (5%) opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-80-110, 9 VAC 5-40-80, 9 VAC 5-50-80 and Condition 10 of 12/22/2004 Permit)

3. Particulate matter emissions from the fabric filter exhausts (Stack Ref. 1-P55A, 2-P56A, 3-P56B, 4-P55B, 5-P57A, 7-P57B, 8-P58A and 24-P42) shall not exceed the process weight limit as determined by the following equation:

$$E = 4.10P^{0.67}$$

where:

E = emission rate in lbs/hr.

P = process weight rate in tons/hr.

(9 VAC 5-80-110 and 9 VAC 5-40-260)

4. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:
  - a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.
  - b. Maintain an inventory of spare parts.
  - c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided, including the names of trainees, the date of training and the nature of the training.

(9 VAC 5-80-110 and Condition 19 of 12/22/2004 Permit)

5. Authorization to install and operate the drill (Ref. G3-ST-DR15) and chamfer (Ref. G3-ST-GR24) shall become invalid, unless an extension is granted by the DEQ, if:
  - a. A program of continuous installation is not commenced before the latest of the following:
    - (1) 18 months from the December 22, 2004;
    - (2) Nine months from the date that the last permit or other authorization was issued from any other governmental agency;
    - (3) Nine months from the date of the last resolution of any litigation concerning any such permits or authorization; or
  - b. A program of installation is discontinued for a period of 18 months or more, or is not completed within a reasonable time, except for a DEQ approved period between phases of a phased construction project.

(9 VAC 5-80-110 and Condition 16 of 12/22/2004 Permit)

## **B. Monitoring and Recordkeeping**

1. The fabric filters (Ref. PCD1 - PCD5, PCD7, PCD8 and PCD24) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be in operation when the finishing process equipment (Ref. G3) is operating.

(9 VAC 5-80-110 and Condition 6 of 12/22/2004 Permit)

2. The permittee shall perform daily inspections of the fabric filters (Ref. PCD1 - PCD5, PCD7, PCD8 and PCD24). The inspections shall include observation of the presence of visible emissions, and the pressure drop across the fabric filter. If visible emissions are observed, timely corrective action shall be taken such that the fabric filter resumes operation with no visible emissions. All observations and corrective actions taken shall be recorded.

(9 VAC 5-80-110 and Condition 12 of 12/22/2004 Permit)

3. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the [Director, Valley Region](#). These records shall include, but are not limited to:
  - a. Records of maintenance and training as required by Condition VII.A.4.
  - b. A log of daily fabric filter inspection results including:
    - (1) The date, time, and name of person performing each inspection;
    - (2) The pressure drop across each fabric filter;
    - (3) Whether or not there were visible emissions; and
    - (4) Any maintenance or repairs performed as a result of these inspections.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Conditions 13 and 19 of 12/22/2004 Permit)

### C. Testing

1. The permitted facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.  
(9 VAC 5-80-110 and Conditions 7 and 11 of 12/22/2004 Permit)
2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110 and Condition 11 of 12/22/2004 Permit)

### D. Reporting

The permittee shall furnish written notification to the [Director, Valley Region, of the](#) actual start-up date of the drill (Ref. G3-ST-DR15) and chamfer (Ref. G3-ST-GR24) within 15 days after such date.

(9 VAC 5-80-110 and Condition 14 of 12/22/2004 Permit)

## VIII. Process Equipment Requirements – Pelletizer Treatment Plant (Ref. G5)

### A. Limitations

1. Particulate matter emissions from the pelletizer treatment plant (Ref. G5) shall be controlled by fabric filter (Ref. PCD25). The fabric filter shall be provided with adequate access for inspection and shall be in operation when the pelletizer treatment plant is operating.

(9 VAC 5-80-110)

2. Visible emissions from the fabric filter exhaust (Stack Ref. 25-P76) shall not exceed twenty percent (20%) opacity except during one six-minute period in any one hour in which visible emissions shall not exceed thirty percent (30%) opacity.

(9 VAC 5-80-110 and 9 VAC 5-50-80)

3. Particulate matter emissions from the fabric filter exhaust (Stack Ref. Ref. 25-P76) shall not exceed the process weight limit as determined by the following equation:

$$E = 4.10P^{0.67}$$

where:

E = emission rate in lbs/hr.

P = process weight rate in tons/hr.

(9 VAC 5-80-110 and 9 VAC 5-40-260)

4. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

- b. Maintain an inventory of spare parts.

- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.

- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided, including the names of trainees, the date of training and the nature of the training.

(9 VAC 5-80-110)

**B. Monitoring and Recordkeeping**

1. The fabric filter (Ref. PCD25) shall be equipped with a device to continuously measure the differential pressure drop across the fabric filter. The device shall be installed in an accessible location and shall be in operation when the pelletizer treatment plant (Ref. G5) is operating.  
(9 VAC 5-80-110)
2. The permittee shall perform daily inspections of the fabric filter (Ref. PCD25). The inspections shall include observation of the presence of visible emissions, and the pressure drop across the fabric filter. If visible emissions are observed, timely corrective action shall be taken such that the fabric filter resumes operation with no visible emissions. All observations and corrective actions taken shall be recorded.  
(9 VAC 5-80-110)
3. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the [Director, Valley Region](#). These records shall include, but are not limited to:
  - a. Records of maintenance and training as required by Condition VIII.A.4.
  - b. A log of daily fabric filter inspection results including:
    - (1) The date, time, and name of person performing each inspection;
    - (2) The pressure drop across each fabric filter;
    - (3) Whether or not there were visible emissions; and
    - (4) Any maintenance or repairs performed as a result of these inspections.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110)

**C. Testing**

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110)



## **IX. Process Equipment Requirements – 1998 Expansion (Ref. G7)**

### **A. Limitations**

1. Particulate matter emissions from the preforming and finishing equipment (Ref. G7-ST-SAW1 and G7-ST-SAW2, G7-ST-PR28 through G7-ST-PR32 and G7-ST-GR1) shall be controlled by a fabric filter (PCD27). Drop boxes (PCD27D1 and PCD27D2) shall be used in conjunction with the fabric filter when operating the two (2) bandsaws (Ref. G7-ST-SAW1 and G7-ST-SAW2). The drop boxes, associated with the two (2) bandsaws, and fabric filter shall be provided with adequate access for inspection and shall be in operation when the preforming and finishing equipment (Ref. G7) is operating.

(9 VAC 5-80-110 and Condition 3 of the 12/22/2004 Permit)

2. The annual brake compound throughput to the preforming and finishing equipment (Ref. G7-ST-SAW1 and G7-ST-SAW2, G7-ST-PR28 through G7-ST-PR32 and G7-ST-GR1) shall not exceed 4942 tons per year, calculated monthly as the sum of each consecutive 12-month period.

(9 VAC 5-80-110 and Condition 8 of the 12/22/2004 Permit)

3. Emissions from the preforming and finishing equipment (Ref. G7-ST-SAW1 and G7-ST-SAW2, G7-ST-PR28 through G7-ST-PR32 and G7-ST-GR1) shall not exceed the limits specified below:

Particulate Matter	2.0 lbs/hr	8.8 tons/yr
PM-10	2.0 lbs/hr	8.8 tons/yr

Annual emissions shall be calculated monthly as the sum of each consecutive 12-month period.

(9 VAC 5-80-110 and Condition 9 of the 12/22/2004 Permit)

4. Visible emissions from the preforming and finishing equipment exhaust (Stack Ref. 27-P95) shall not exceed 5% opacity as determined by EPA Method 9 (reference 40 CFR 60, Appendix A).

(9 VAC 5-80-110 and Condition 10 of the 12/22/2004 Permit)

5. The permittee shall take the following measures in order to minimize the duration and frequency of excess emissions, with respect to air pollution control equipment, monitoring devices, and process equipment which affect such emissions:

- a. Develop a maintenance schedule and maintain records of all scheduled and non-scheduled maintenance.

- b. Maintain an inventory of spare parts.

- c. Have available written operating procedures for equipment. These procedures shall be based on the manufacturer's recommendations, at a minimum.
- d. Train operators in the proper operation of all such equipment and familiarize the operators with the written operating procedures. The permittee shall maintain records of the training provided, including the names of trainees, the date of training and the nature of the training.

(9 VAC 5-80-110 and Condition 19 of 12/22/2004 Permit)

## **B. Monitoring and Recordkeeping**

- 1. The fabric filter (Ref. PCD27) shall be equipped with a monitoring device to continuously measure the differential pressure drop across the fabric filter. The monitoring device shall be installed, maintained, calibrated and operated in accordance with approved procedures which shall include, as a minimum, the manufacturer's written requirements or recommendations. The monitoring device shall be provided with adequate access for inspection and shall be in operation when the preforming and finishing equipment (Ref. G7-ST-SAW1 and G7-ST-SAW2, G7-ST-PR28 through G7-ST-PR32 and G7-ST-GR1) is operating.

(9 VAC 5-80-110 and Condition 6 of the 12/22/2004 Permit)

- 2. The permittee shall perform daily inspections of the fabric filter (Ref. PCD27). The inspections shall include an observation of the presence of visible emissions and the differential pressure drop across the fabric filter. The presence of visible emissions shall require further investigation as to the cause of the visible emissions and corrective action shall be taken. All observations and corrective actions taken shall be recorded.

(9 VAC 5-80-110 and Condition 12 of the 12/22/2004 Permit)

- 3. The permittee shall maintain records of emission data and operating parameters as necessary to demonstrate compliance with this permit. The content and format of such records shall be arranged with the [Director, Valley Region](#). These records shall include, but are not limited to:

- a. Monthly and annual throughput of brake compound to the preforming and finishing equipment (Ref. G7-ST-SAW1 and G7-ST-SAW2, G7-ST-PR28 through G7-ST-PR32 and G7-ST-GR1); and
- b. Records of maintenance and training as required by Condition IX.A.5.
- c. A log of daily fabric filter inspection results including:

- (1) The date, time, and name of person performing each inspection;

- (2) The pressure drop across each fabric filter;
- (3) Whether or not there were visible emissions; and
- (4) Any maintenance or repairs performed as a result of these inspections.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110 and Conditions 13 and 19 of 12/22/2004 Permit)

### C. Testing

1. The facility shall be constructed so as to allow for emissions testing upon reasonable notice at any time using appropriate methods. Upon request from the Department, test ports shall be provided at the appropriate locations.  
(9 VAC 5-80-110 and Condition 7 of 12/22/2004 Permit)
2. If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
PM	EPA Methods 5, 17
Visible Emission	EPA Method 9

(9 VAC 5-80-110 and Condition 11 of the 12/22/2004 Permit)

### D. Reporting

The permittee shall furnish notification to the Director, Valley Region, of malfunctions of the affected facility or related air pollution control equipment that may cause excess emissions for more than one hour, by facsimile transmission, telephone or telegraph. Such notification shall be made as soon as practicable but not later than four daytime business hours after the malfunction is discovered. The permittee shall provide a written statement giving all pertinent facts, including the estimated duration of the breakdown, within 14 days of the discovery. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the permittee shall notify the Director, Valley Region, in writing.

(9 VAC 5-80-110 and Condition 15 of the 12/22/2004 Permit)

**X. Facility Wide Conditions (includes Ref. G6 equipment)****A. Monitoring and Recordkeeping**

The permittee shall perform the following monitoring and recordkeeping:

1. The VOC content of each organic process material, printing ink, coating, adhesive and solvent used shall be determined and recorded using EPA Reference Method 24, 40 CFR Part 60, Appendix A. A VOC data sheet per 40 CFR Part 63, Subpart II, Appendix A, or MSDS sheet from the supplier will suffice in lieu of testing.
2. Annual records of the amount of each organic process material, printing ink, coating, adhesive and solvent used in the facility in gallons.

These records shall be available for inspection by the DEQ and shall be current for the most recent five (5) years.

(9 VAC 5-80-110)

**B. Testing**

If testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods in accordance with procedures approved by the DEQ as follows:

Pollutant	Test Method (40 CFR Part 60, Appendix A)
VOC	EPA Method 24

(9 VAC 5-80-110)

## **XI. Hazardous Air Pollutant Conditions**

Unless the permittee obtains federally enforceable limits on its facility-wide emissions of hazardous air pollutants (HAPs) to below major-source thresholds prior to the specified date, the following federal requirements, derived from 40 CFR Part 63, will apply. For each standard, “requirements” include all control, operational, work practice, monitoring, recordkeeping, reporting, and testing requirements, as applicable.

### **A. Limitations**

1. Except where this permit is more restrictive, each existing solvent mixer at a friction materials manufacturing facility which uses a solvent in their mixer that contains one or more HAP as an ingredient to the friction material composition shall comply with 40 CFR Part 63 Subpart QQQQQ (Friction Materials Manufacturing Facilities NESHAP) no later than October 18, 2005. An affected source is an existing source if its construction began before October 4, 2001. A new or reconstructed affected source with an initial start up date on or after October 4, 2001, but before October 18, 2002, must be in compliance by October 18, 2002. A new or reconstructed source with an initial start up date after October 18, 2002 must be in compliance upon initial start up. An affected source is considered reconstructed if it meets definition of “reconstruction” in 40 CFR 63.2.  
(9 VAC 5-60-90, 9 VAC 5-60-100, 9 VAC 5-80-110 and 40 CFR 63 Subpart QQQQQ)
2. Except where this permit is more restrictive, existing boilers and process heaters (not including space heaters) shall comply with 40 CFR Part 63 Subpart DDDDD (Industrial/Commercial/Institutional Boilers and Process Heater NESHAP) no later than three years after the date of final rule publication in the Federal Register. New industrial boilers and process heaters must comply with the final rule when they are brought on line. New units have up to six months after the rule is final, or six months after startup, whichever is later, to demonstrate compliance with 40 CFR Part 63 Subpart DDDDD.  
(9 VAC 5-60-90, 9 VAC 5-60-100, 9 VAC 5-80-110 and 40 CFR 63 Subpart DDDDD)

## **B. Recordkeeping**

1. Except where this permit is more restrictive, the permittee shall record and retain all information necessary to determine compliance with 40 CFR Part 63 Subpart QQQQQ.  
(9 VAC 5-60-90, 9 VAC 5-60-100, 9 VAC 5-80-110 and 40 CFR 63 Subpart QQQQQ)
2. Except where this permit is more restrictive, the permittee shall record and retain all information necessary to determine compliance with 40 CFR Part 63 Subpart DDDDD.  
(9 VAC 5-60-90, 9 VAC 5-60-100, 9 VAC 5-80-110 and 40 CFR 63 Subpart DDDDD)

## **C. Reporting**

1. All notifications required by 40 CFR 63.9 (a) through (d) and (h) through (j) as applicable and 40 CFR Part 63 Subpart QQQQQ shall be provided by the dates specified, unless the permittee obtains federally enforceable limits on its facility-wide emissions of HAPs to below major-source thresholds prior to the notification dates specified. Notifications shall be submitted to the Director, Valley Region. A copy of each notification shall be provided to EPA Region III, to the attention of the Friction Materials Manufacturing Facilities NESHAP Coordinator, at the following address:

EPA Region III  
Air Enforcement Branch  
3AP12  
1650 Arch Street  
Philadelphia PA 19103

(9 VAC 5-60-90, 9 VAC 5-60-100, 9 VAC 5-80-110 and 40 CFR 63 Subpart QQQQQ)

2. All notifications required by 40 CFR 63.7(b) and (c), 63.8 (e), (f)(4) and (6), and 63.9 (b) through (h) and 40 CFR Part 63 Subpart DDDDD shall be provided by the dates specified, unless the permittee obtains federally enforceable limits on its facility-wide emissions of HAPs to below major-source thresholds prior to the notification dates specified. Notifications shall be submitted to the Director, Valley Region. A copy of each notification shall be provided to EPA Region III, to the attention of the Industrial/Commercial/Institutional Boilers and Process Heater NESHAP Coordinator, at the following address:

EPA Region III  
Air Enforcement Branch  
3AP12  
1650 Arch Street  
Philadelphia PA 19103

(9 VAC 5-60-90, 9 VAC 5-60-100, 9 VAC 5-80-110 and 40 CFR 63 Subpart DDDDD)

## XII. Insignificant Emission Units

The following emission units at the facility are identified in the application as insignificant emission units under 9 VAC 5-80-720:

Emission Unit No.	Emission Unit Description	Citation	Pollutant(s) Emitted (9 VAC 5-80-720 B)	Rated Capacity (9 VAC 5-80-720 C)
FB3, FB65-FB66	Reznor Gas Heaters	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB28-FB29 FB33, FB98	Dravo Counterflow Heaters	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB34, FB78 FB60-FB61 FB90-FB96	Modine Gas Heaters	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB35	American Standard Boiler	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB36-FB47 FB57-FB58	Dravo Direct Flow Heaters	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB52, FB77 FB70-FB73	Carrier Gas Heaters	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB74-FB76	Aerovent Gas Heaters	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB80-FB82, FB84	Hot Water Heaters	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB86-FB89, FB97	Hastings Direct Fired Heaters	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
FB99-FB100	Heat Pumps	9 VAC 5-80-720 C	-	<10 MMBTU/HR burning natural gas
P1, P2	Product Cooling Booth	9 VAC 5-80-720 B	VOC	-
P12	Resin Drum Warming Oven	9 VAC 5-80-720 B	VOC	-
P51	Compactor	9 VAC 5-80-720 B	PM	-
P53	Tool Room	9 VAC 5-80-720 B	PM	-
P54	Pilot Plant	9 VAC 5-80-720 B	PM	-
P90, P91	Heat Exhaustors	9 VAC 5-80-720 B	VOC	-
P94	Bondomatic	9 VAC 5-80-720 B	VOC	-

These emission units are presumed to be in compliance with all requirements of the federal Clean Air Act as may apply. Based on this presumption, no monitoring, recordkeeping, or reporting shall be required for these emission units in accordance with 9 VAC 5-80-110.



### **XIII. Permit Shield & Inapplicable Requirements**

Compliance with the provisions of this permit shall be deemed in compliance with all applicable requirements in effect as of the permit issuance date as identified in this permit. This permit shield covers only those applicable requirements covered by terms and conditions in this permit and the following requirements which have been specifically identified as being not applicable to this permitted facility:

Citation	Title of Citation	Description of Applicability
None identified		

Nothing in this permit shield shall alter the provisions of §303 of the federal Clean Air Act, including the authority of the administrator under that section, the liability of the owner for any violation of applicable requirements prior to or at the time of permit issuance, or the ability to obtain information by the administrator pursuant to §114 of the federal Clean Air Act, (ii) the Board pursuant to §10.1-1314 or §10.1-1315 of the Virginia Air Pollution Control Law, or (iii) the Department pursuant to §10.1-1307.3 of the Virginia Air Pollution Control Law.

(9 VAC 5-80-140)

## **XIV. General Conditions**

### **A. Federal Enforceability**

All terms and conditions in this permit are enforceable by the administrator and citizens under the federal Clean Air Act, except those that have been designated as only state-enforceable.

(9 VAC 5-80-110 N)

### **B. Permit Expiration**

This permit has a fixed term of five years. The expiration date shall be the date five years from the date of issuance. Unless the owner submits a timely and complete application for renewal to the Department consistent with the requirements of 9 VAC 5-80-80, the right of the facility to operate shall be terminated upon permit expiration.

1. The owner shall submit an application for renewal at least six months but no earlier than eighteen months prior to the date of permit expiration.
2. If an applicant submits a timely and complete application for an initial permit or renewal under this section, the failure of the source to have a permit or the operation of the source without a permit shall not be a violation of Article 1, Part II of 9 VAC 5 Chapter 80, until the Board takes final action on the application under 9 VAC 5-80-150.
3. No source shall operate after the time that it is required to submit a timely and complete application under subsections C and D of 9 VAC 5-80-80 for a renewal permit, except in compliance with a permit issued under Article 1, Part II of 9 VAC 5 Chapter 80.
4. If an applicant submits a timely and complete application under section 9 VAC 5-80-80 for a permit renewal but the Board fails to issue or deny the renewal permit before the end of the term of the previous permit, (i) the previous permit shall not expire until the renewal permit has been issued or denied and (ii) all the terms and conditions of the previous permit, including any permit shield granted pursuant to 9 VAC 5-80-140, shall remain in effect from the date the application is determined to be complete until the renewal permit is issued or denied.
5. The protection under subsections F 1 and F 5 (ii) of section 9 VAC 5-80-80 F shall cease to apply if, subsequent to the completeness determination made pursuant section 9 VAC 5-80-80 D, the applicant fails to submit by the deadline specified in writing by the Board any additional information identified as being needed to process the application.

(9 VAC 5-80-80 B, C and F, 9 VAC 5-80-110 D and 9 VAC 5-80-170 B)

**C. Recordkeeping and Reporting**

1. All records of monitoring information maintained to demonstrate compliance with the terms and conditions of this permit shall contain, where applicable, the following:
  - a. The date, place as defined in the permit, and time of sampling or measurements.
  - b. The date(s) analyses were performed.
  - c. The company or entity that performed the analyses.
  - d. The analytical techniques or methods used.
  - e. The results of such analyses.
  - f. The operating conditions existing at the time of sampling or measurement.

(9 VAC 5-80-110 F)

2. Records of all monitoring data and support information shall be retained for at least five years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit.

(9 VAC 5-80-110 F)

3. The permittee shall submit the results of monitoring contained in any applicable requirement to DEQ no later than **March 1** and **September 1** of each calendar year. This report must be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

- a. The time period included in the report. The time periods to be addressed are January 1 to June 30 and July 1 to December 31.
- b. All deviations from permit requirements. For purposes of this permit, deviations include, but are not limited to:

- (1) Exceedance of emissions limitations or operational restrictions;
- (2) Excursions from control device operating parameter requirements, as documented by continuous emission monitoring, periodic monitoring, or compliance assurance monitoring which indicates an exceedance of emission limitations or operational restrictions; or,
- (3) Failure to meet monitoring, recordkeeping, or reporting requirements contained in this permit.

- c. If there were no deviations from permit conditions during the time period, the permittee shall include a statement in the report that “no deviations from permit requirements occurred during this semi-annual reporting period.”

(9 VAC 5-80-110 F)

#### **D. Annual Compliance Certification**

Exclusive of any reporting required to assure compliance with the terms and conditions of this permit or as part of a schedule of compliance contained in this permit, the permittee shall submit to EPA and DEQ no later than **March 1** each calendar year a certification of compliance with all terms and conditions of this permit including emission limitation standards or work practices. The compliance certification shall comply with such additional requirements that may be specified pursuant to §114(a)(3) and §504(b) of the federal Clean Air Act. This certification shall be signed by a responsible official, consistent with 9 VAC 5-80-80 G, and shall include:

1. The time period included in the certification. The time period to be addressed is January 1 to December 31.
2. The identification of each term or condition of the permit that is the basis of the certification.
3. The compliance status.
4. Whether compliance was continuous or intermittent, and if not continuous, documentation of each incident of non-compliance.
5. Consistent with subsection 9 VAC 5-80-110 E, the method or methods used for determining the compliance status of the source at the time of certification and over the reporting period.
6. Such other facts as the permit may require to determine the compliance status of the source.

One copy of the annual compliance certification shall be sent to EPA at the following address:

Clean Air Act Title V Compliance Certification (3AP00)  
U. S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029.

(9 VAC 5-80-110 K.5)

**E. Permit Deviation Reporting**

The permittee shall notify the Director, VRO Region, within four daytime business hours, after discovery of any deviations from permit requirements which may cause excess emissions for more than one hour, including those attributable to upset conditions as may be defined in this permit. In addition, within 14 days of the discovery, the permittee shall provide a written statement explaining the problem, any corrective actions or preventative measures taken, and the estimated duration of the permit deviation. The occurrence should also be reported in the next semi-annual compliance monitoring report pursuant to General Condition XIV.C.3 of this permit.

(9 VAC 5-80-110 F.2 and 9 VAC 5-80-250)

**F. Failure/Malfunction Reporting**

In the event that any affected facility or related air pollution control equipment fails or malfunctions in such a manner that may cause excess emissions for more than one hour, the owner shall, as soon as practicable but no later than four daytime business hours after the malfunction is discovered, notify the Director, Valley Region, by facsimile transmission, telephone or telegraph of such failure or malfunction and shall within 14 days of discovery provide a written statement giving all pertinent facts, including the estimated duration of the breakdown. When the condition causing the failure or malfunction has been corrected and the equipment is again in operation, the owner shall notify the Director, Valley Region.

(9 VAC 5-20-180 C and Condition 15 of the 12/22/2004 Permit)

**G. Severability**

The terms of this permit are severable. If any condition, requirement or portion of the permit is held invalid or inapplicable under any circumstance, such invalidity or inapplicability shall not affect or impair the remaining conditions, requirements, or portions of the permit.

(9 VAC 5-80-110 G.1)

**H. Duty to Comply**

The permittee shall comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the federal Clean Air Act or the Virginia Air Pollution Control Law or both and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or, for denial of a permit renewal application.

(9 VAC 5-80-110 G.2)

**I. Need to Halt or Reduce Activity not a Defense**

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

(9 VAC 5-80-110 G.3)

**J. Permit Modification**

A physical change in, or change in the method of operation of, this stationary source may be subject to permitting under State Regulations 9 VAC 5-80-50, 9 VAC 5-80-1100, 9 VAC 5-80-1790, or 9 VAC 5-80-2000 and may require a permit modification and/or revisions except as may be authorized in any approved alternative operating scenarios. (9 VAC 5-80-190 and 9 VAC 5-80-260)

**K. Property Rights**

The permit does not convey any property rights of any sort, or any exclusive privilege. (9 VAC 5-80-110 G.5)

**L. Duty to Submit Information**

1. The permittee shall furnish to the Board, within a reasonable time, any information that the Board may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Board copies of records required to be kept by the permit and, for information claimed to be confidential, the permittee shall furnish such records to the Board along with a claim of confidentiality. (9 VAC 5-80-110 G.6)

2. Any document (including reports) required in a permit condition to be submitted to the Board shall contain a certification by a responsible official that meets the requirements of 9 VAC 5-80-80 G. (9 VAC 5-80-110 K.1)

**M. Duty to Pay Permit Fees**

The owner of any source for which a permit under 9 VAC 5-80-50 through 9 VAC 5-80-300 was issued shall pay permit fees consistent with the requirements of 9 VAC 5-80-310 through 9 VAC 5-80-350. The actual emissions covered by the permit program fees for the preceding year shall be calculated by the owner and submitted to the Department by **April 15** of each year. The calculations and final amount of emissions are subject to verification and final determination by the Department. (9 VAC 5-80-110 H and 9 VAC 5-80-340 C)

**N. Fugitive Dust Emission Standards**

During the operation of a stationary source or any other building, structure, facility, or installation, no owner or other person shall cause or permit any materials or property to be handled, transported, stored, used, constructed, altered, repaired, or demolished without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions may include, but are not limited to, the following:

1. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of land;
2. Application of asphalt, water, or suitable chemicals on dirt roads, materials stockpiles, and other surfaces which may create airborne dust; the paving of roadways and the maintaining of them in a clean condition;
3. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty material. Adequate containment methods shall be employed during sandblasting or other similar operations;
4. Open equipment for conveying or transporting material likely to create objectionable air pollution when airborne shall be covered or treated in an equally effective manner at all times when in motion; and,
5. The prompt removal of spilled or tracked dirt or other materials from paved streets and of dried sediments resulting from soil erosion.

(9 VAC 5-40-90 and 9 VAC 5-50-90)

**O. Startup, Shutdown, and Malfunction**

At all times, including periods of startup, shutdown, soot blowing, and malfunction, owners shall, to the extent practicable, maintain and operate any affected facility including associated air pollution control equipment in a manner consistent with air pollution control practices for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on information available to the Board, which may include, but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source.

(9 VAC 5-50-20 E and 9 VAC 5-40-20 E)

**P. Alternative Operating Scenarios**

Contemporaneously with making a change between reasonably anticipated operating scenarios identified in this permit, the permittee shall record in a log at the permitted facility a record of the scenario under which it is operating. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions under each such operating scenario. The terms and conditions of each such alternative scenario shall meet all applicable requirements including the requirements of 9 VAC 5 Chapter 80, Article 1. (9 VAC 5-80-110 J)

**Q. Inspection and Entry Requirements**

The permittee shall allow DEQ, upon presentation of credentials and other documents as may be required by law, to perform the following:

1. Enter upon the premises where the source is located or emissions-related activity is conducted, or where records must be kept under the terms and conditions of the permit.
2. Have access to and copy, at reasonable times, any records that must be kept under the terms and conditions of the permit.
3. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit.
4. Sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.

(9 VAC 5-80-110 K.2)

**R. Reopening For Cause**

The permit shall be reopened by the Board if additional federal requirements become applicable to a major source with a remaining permit term of three years or more. Such reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended pursuant to 9 VAC 5-80-80 F.



1. The permit shall be reopened if the Board or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emissions standards or other terms or conditions of the permit.
2. The permit shall be reopened if the administrator or the Board determines that the permit must be revised or revoked to assure compliance with the applicable requirements.
3. The permit shall not be reopened by the Board if additional applicable state requirements become applicable to a major source prior to the expiration date established under 9 VAC 5-80-110 D.

(9 VAC 5-80-110 L)

#### **S. Permit Availability**

Within five days after receipt of the issued permit, the permittee shall maintain the permit on the premises for which the permit has been issued and shall make the permit immediately available to DEQ upon request.

(9 VAC 5-80-150 E)

#### **T. Transfer of Permits**

1. No person shall transfer a permit from one location to another, unless authorized under 9 VAC 5-80-130, or from one piece of equipment to another.  
(9 VAC 5-80-160)
2. In the case of a transfer of ownership of a stationary source, the new owner shall comply with any current permit issued to the previous owner. The new owner shall notify the Board of the change in ownership within 30 days of the transfer and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-160)
3. In the case of a name change of a stationary source, the owner shall comply with any current permit issued under the previous source name. The owner shall notify the Board of the change in source name within 30 days of the name change and shall comply with the requirements of 9 VAC 5-80-200.  
(9 VAC 5-80-160)

#### **U. Malfunction as an Affirmative Defense**

1. A malfunction constitutes an affirmative defense to an action brought for noncompliance with technology-based emission limitations if the requirements of paragraph 2 of this condition are met.

2. The affirmative defense of malfunction shall be demonstrated by the permittee through properly signed, contemporaneous operating logs, or other relevant evidence that show the following:
  - a. A malfunction occurred and the permittee can identify the cause or causes of the malfunction.
  - b. The permitted facility was at the time being properly operated.
  - c. During the period of the malfunction the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit.
  - d. The permittee notified the board of the malfunction within two working days following the time when the emission limitations were exceeded due to the malfunction. This notification shall include a description of the malfunction, any steps taken to mitigate emissions, and corrective actions taken. The notification may be delivered either orally or in writing. The notification may be delivered by electronic mail, facsimile transmission, telephone, or any other method that allows the permittee to comply with the deadline. This notification fulfills the requirements of 9 VAC 5-80-110 F 2 b to report promptly deviations from permit requirements. This notification does not release the permittee from the malfunction reporting requirement under 9 VAC 5-20-180 C.
3. In any enforcement proceeding, the permittee seeking to establish the occurrence of a malfunction shall have the burden of proof.
4. The provisions of this section are in addition to any malfunction, emergency or upset provision contained in any applicable requirement.

(9 VAC 5-80-250)

## **V. Permit Revocation or Termination for Cause**

A permit may be revoked or terminated prior to its expiration date if the owner knowingly makes material misstatements in the permit application or any amendments thereto or if the permittee violates, fails, neglects or refuses to comply with the terms or conditions of the permit, any applicable requirements, or the applicable provisions of 9 VAC 5 Chapter 80 Article 1. The Board may suspend, under such conditions and for such period of time as the Board may prescribe any permit for any of the grounds for revocation or termination or for any other violations of these regulations.  
(9 VAC 5-80-190 C and 9 VAC 5-80-260)

**W. Duty to Supplement or Correct Application**

Any applicant who fails to submit any relevant facts or who has submitted incorrect information in a permit application shall, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrections. An applicant shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete application was filed but prior to release of a draft permit.

(9 VAC 5-80-80 E)

**X. Stratospheric Ozone Protection**

If the permittee handles or emits one or more Class I or II substances subject to a standard promulgated under or established by Title VI (Stratospheric Ozone Protection) of the federal Clean Air Act, the permittee shall comply with all applicable sections of 40 CFR Part 82, Subparts A to F.

(40 CFR Part 82, Subparts A-F)

**Y. Asbestos Requirements**

The permittee shall comply with the requirements of National Emissions Statements for Hazardous Air Pollutants (40 CFR 61) Subpart M, National Emission Standards for Asbestos as it applies to the following: Standards for Demolition and Renovation (40 CFR 61.145), Standards for Insulating Materials (40 CFR 61.150).

(9 VAC 5-60-70 and 9 VAC 5-80-110 A.1)

**Z. Accidental Release Prevention**

If the permittee has more, or will have more than a threshold quantity of a regulated substance in a process, as determined by 40 CFR 68.115, the permittee shall comply with the requirements of 40 CFR Part 68.

(40 CFR Part 68)

**AA. Changes to Permits for Emissions Trading**

No permit revision shall be required under any federally approved economic incentives, marketable permits, emissions trading and other similar programs or processes for changes that are provided for in this permit.

(9 VAC 5-80-110 I)

**BB. Emissions Trading**

Where the trading of emissions increases and decreases within the permitted facility is to occur within the context of this permit and to the extent that the regulations provide for trading such increases and decreases without a case-by-case approval of each emissions trade:

1. All terms and conditions required under 9 VAC 5-80-110, except subsection N, shall be included to determine compliance.
2. The permit shield described in 9 VAC 5-80-140 shall extend to all terms and conditions that allow such increases and decreases in emissions.
3. The owner shall meet all applicable requirements including the requirements of 9 VAC 5-80-50 through 9 VAC 5-80-300.

(9 VAC 5-80-110 I)